

ORIGINAL

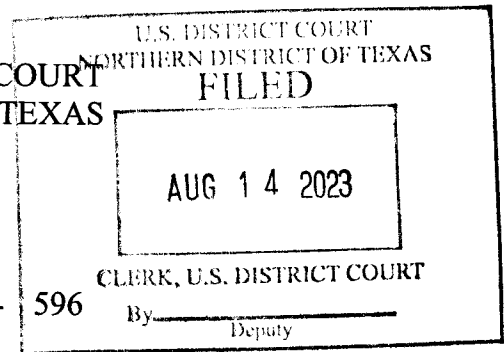
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

RAHED ALAHMARI (01)

No. 4:23-MJ- 596



CRIMINAL COMPLAINT

I, Task Force Officer Aeron Hill, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Alleged Offense:

On or about July 17, 2023, in the Fort Worth Division of the Northern District of Texas, the defendant, **Rahed Alahmari**, did knowingly possess a machinegun, that is, a Glock conversion device designed and intended for use in converting a weapon into a machinegun, in violation of 18 U.S.C. § 922(o).

Probable Cause:

1. I am a Task Force Officer (TFO) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and have been so employed since August 2022. I am currently assigned to the Dallas Field Division office. As an ATF TFO, my primary responsibilities are enforcing federal firearms laws as set forth in the United States Code, including the following violations pertaining to this investigation. As a result of training and experience as a TFO, I am familiar with the federal firearms laws and know it is unlawful for a person to transfer or be in possession of a machinegun that is not registered in the National Firearms and Registration Transfer Record. The statements set forth in this affidavit are true and correct to the best of my knowledge and belief but are not inclusive of all the evidence or information in the case.

2. On July 16, 2023, an APD Detective working in an undercover (UC) capacity contacted **Alahmari** by phone to purchase three machine gun conversion devices,

commonly referred to as “Glock switches,” and drum magazine containing ammunition, all for \$1,000. **Alahmari** agreed to sell the UC the items and scheduled the transaction for the next day in the parking lot of a business located at 3300 E Broad St, Mansfield, Texas.

3. At approximately 10:10 a.m. on July 17, 2023, **Alahmari** met with the UC at 3300 E Broad St. As **Alahmari** sat down in the front passenger seat of the undercover vehicle, **Alahmari** opened a grocery bag and retrieved a small paper envelope that contained three machinegun conversion devices. **Alahmari** handed the envelope containing the machine gun conversion devices to the UC to inspect.

4. As the UC inspected the machine gun conversion devices, he asked **Alahmari** if the machinegun conversion devices had the option to set the firearm in both fully automatic and semi-automatic. **Alahmari** responded by pointing out a button on the Glock switch and saying, “Ya, to the left is semi, right is fully auto.” The UC replied, “So I pull that bitch one time and its (unintelligible).” **Alahmari** interrupted the UC and while making a hand motion depicting a pistol recoiling into the air said, “Hhhrrrrrrrrrrrrrrrr! Just like that. We’ll go to the dead end and bust off some shots if you want later.”

5. **Alahmari** showed the UC the drum magazine which **Alahmari** said was “filled to the brim.” The drum magazine remained inside the grocery bag. The UC handed **Alahmari** \$1,000 in pre-recorded ATF agent cashier funds and **Alahmari** counted it to confirm all the money was there.

6. The UC left the transaction location in a separate direction of **Alahmari** around 10:15 a.m.

7. An ATF Firearms Enforcement Officer determined the three purchased machine gun conversion devices were designed for use in converting a semi-automatic Glock style firearm to function in a fully automatic mode. Therefore, each machinegun conversion device is a machinegun.

8. On July 18, 2023, an ATF Special Agent queried **Alahmari** in the National Firearms Registration and Transfer Record. The query showed **Alahmari** does not have any NFA items registered to him.

Based upon the above facts and circumstances, I believe there is probable cause to believe that **Rahed Alahmari** knowingly possessed a machinegun, in violation of 18 U.S.C. § 922(o).


Aeron Hill
ATF Task Force Officer

SWORN AND SUBSCRIBED before me, on this 14 day of August, 2023 at 1:20 am/pm, in Fort Worth, Texas.


JEFFREY L. CURETON
UNITED STATES MAGISTRATE JUDGE